

# Permitting decisions

## Variation

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We have decided to grant the variation for Preston Waste Management Centre operated by Veolia ES Cleanaway (UK) Limited.

The variation number is [EPR/BU5500IC/V006](#).

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

## Purpose of this document

This decision document provides a record of the decision making process. It:

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision checklist](#) to show how all relevant factors have been taken into account
- shows how we have considered the [consultation responses](#)

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit and the variation notice. The introductory note summarises what the variation covers.

# Key issues of the decision

## Variation EPR/BU5500IC/V006

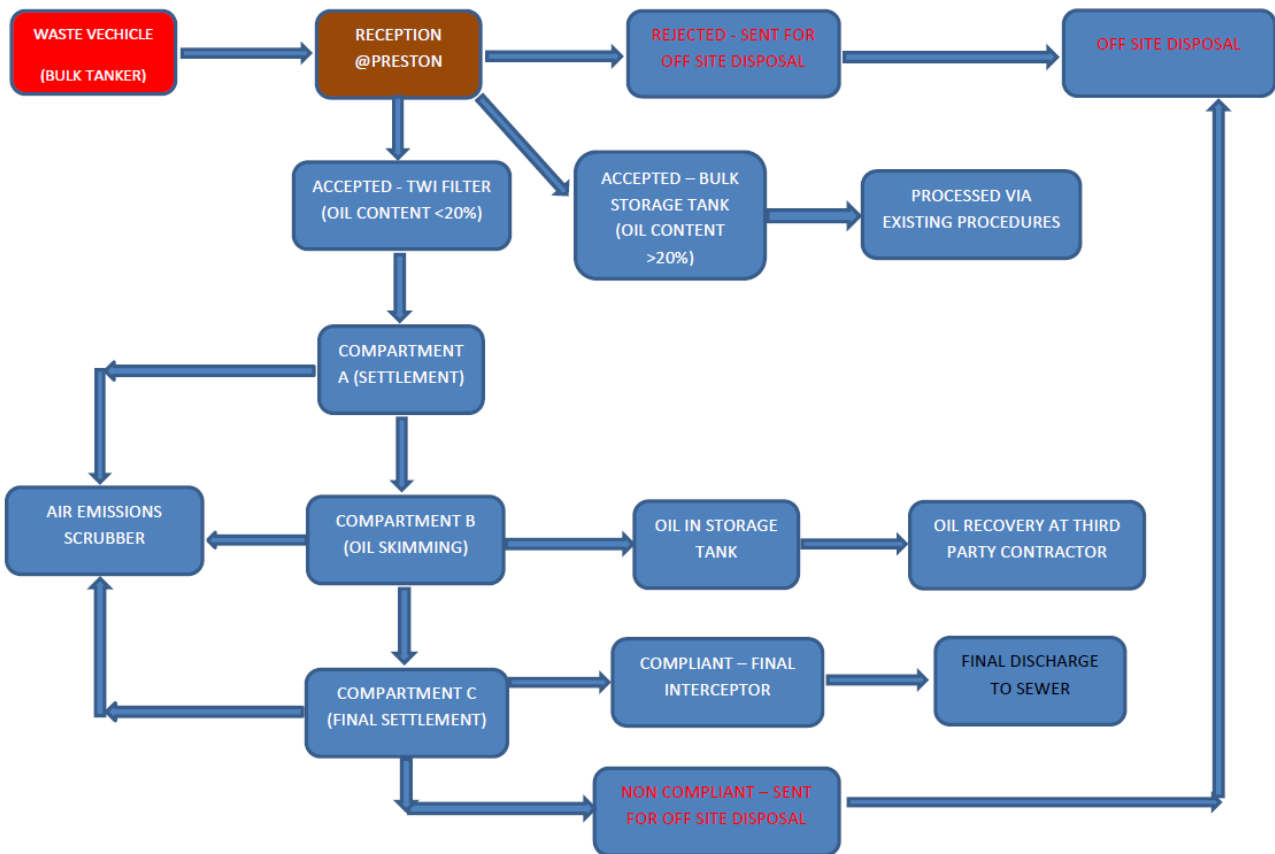
This variation reintroduces the oil recovery installation comprising of a three-stage interceptor, known as the Trade Waste Interceptor (TWI). The previous TWI has been replaced with a modernised structure which benefits from a cover, scrubber and leak detection.

Liquid oil wastes are fed from road tankers or drums into the first stage of the interceptor, where solids are retained by a screen, with liquids passing over a weir. In the second stage, finer solids settle out and oil separates to the surface where it is skimmed off. The third stage allows for further settlement and the remaining liquid to be pumped out for disposal via the sewer. Separated oil is transferred to a dedicated storage tank in storage area C.

There are emissions to sewer from the TWI, these include heavy metals and hydrocarbons tested against the requirements of the trade effluent consent, as well as surface water. All emissions pass through a final interceptor prior to discharge to sewer.

The below diagram shows the process flow with respect to the TWI:

Preston WMC Aqueous Waste Treatment – Process Flows



## Trade Waste Interceptor

The TWI has been completely redesigned from the historic construction to comply with Best Available Techniques (BAT) from Sector Guidance Note 5.06 (S5.06) and the Waste Treatment BAT Reference document (Bref).

The TWI will be used to separate any hydrocarbon residues from water based liquid wastes. These wastes will typically either consist of the contents of fat and grease traps or the contents of oil interceptors. No wastes that are predominately oil or other hydrocarbons will be processed through the interceptor.

A new stainless steel tank has been fitted to the existing void with dedicated compartments to allow decanting of the liquor and enhanced settlement of solids. Compartment 1 will be approximately 36m<sup>3</sup> and Compartments 2 and 3 approximately 25m<sup>3</sup>.

Air emissions will be managed via new lid and scrubber system. Potential groundwater/soil emissions will be managed via the new tank and leak detection system. A level probe will be installed down through the new stainless steel liner to detect any leakage into the void space under the liner.

A dedicated tank will be used for the storage of the skimmed oil. This will be an integrally bunded tank with a working capacity of 2,000 litres. The tank is located within the catchment of Storage Area C. Physical barriers are to be installed to prevent damage to the storage tank.

The skimmer unit will be located inside the trade waste interceptor and skimmed oil transferred to the storage tank via appropriate pipework and fittings. In the unlikely event of a spillage this would be contained.

Prior to the operation of the TWI and oil storage tank a number of measures must be installed:

- Scrubber
- Leak detection system
- High level alarm
- Flow meter
- Collision protection

A pre-operational measure for these has been included in table S1.4 of the permit. The operation can commence once written approval has been issued from the Environment Agency.

### **Scrubber**

The treatment process proposed is a gravity driven settlement / separation process that is carried out at ambient temperatures. It is not expected to generate any significant flux of VOCs due to the passive nature of the process in combination with an expectation that the volatile content of the wastes received will have evolved prior to receipt at the site.

Notwithstanding the likely low to negligible flux of VOCs, in order to prevent the fugitive emissions to air and comply with BAT Decision 14d the Trade Waste Interceptor is fitted with a lid whilst any fugitive emissions will be captured and directed to a scrubbing system. The scrubbing system will treat the emissions in a two-stage process:

- (i) A permanent oil recirculation through metal 'knitmesh' packing within the scrubber tower. The oil and knitmesh captures substance volatilised under high temperature and absorbed to the scrubber mesh.
- (ii) A carbon canister for VOC removal is installed downstream of the scrubber and this is connected to the vent stack. The carbon canister is filled with activated carbon to capture high volatility substances.

The proposed scrubber will be a combination of wet scrubbing and adsorption with the use of granular activated carbon. The use of these specified techniques in the proposed scrubbing system therefore represent BAT for the treatment of gaseous emission from Trade Waste Interceptor.

The two abatement techniques have been chosen due to their ability to remove a wide variety of VOC from gaseous waste streams. The wet scrubber is carried out using a severely hydrotreated naphthenic process oil with good solvency properties. Following this the activated carbon will remove residue volatile substances. Activated carbon is the most common adsorbent with a wide target substance range including both polar and non-polar compounds.

Both of the techniques proposed are listed in the in the waste treatment Bref and waste treatment BAT conclusions. They are employed in common use for the removal of VOC from gaseous emissions. Given the low overall flux of VOCs from the trade waste interceptor they are considered to be more than adequate and will achieve the BAT associated emission levels of 3-20mg/Nm<sup>3</sup>.

Activated carbon will also remove any odorous chemicals which tend to be relatively long chain organosulphate molecules, although these will have been preferentially removed within the scrubber tower.

BAT 8 of the Waste Treatment BAT states that the monitoring of VOCs from the Treatment of water-based liquid waste activity being carried out by the Trade Waste Interceptor should be 6 monthly in accordance with EN 12619. There is a caveat that the substance should be relevant in the waste gas stream based on the inventory mentioned in BAT 3.

The potential for emissions to air are negligible and several orders of magnitude below the screening threshold it is therefore considered disproportionate to require monitoring.

However, to verify these assumptions we have included an improvement programme to table S1.3 of the permit for the operator to carry out a one off monitoring exercise during operation of the TWI.

## Decision checklist

| Aspect considered   | Decision  |
|---|---|
| <b>Receipt of application</b>                             |   |
| Confidential information                                  | A claim for commercial or industrial confidentiality has not been made.   |
| Identifying confidential information                      | We have not identified information provided as part of the application that we consider to be confidential.   |
| <b>Consultation</b>                                       |   |
| Consultation  | <p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website.</p> <p>We consulted the following organisations:</p> <ul style="list-style-type: none"> <li>• Food Standards Agency</li> <li>• Preston City Council - Environmental Health</li> <li>• Centre for Environment, Fisheries and Aquaculture Science</li> <li>• North Western Inshore Fisheries and Conservation Authority</li> <li>• Health and Safety Executive</li> <li>• United Utilities - Sewerage Undertaker</li> <li>• Public Health England</li> <li>• Lancashire County Council - Director of Public Health</li> </ul> <p>The comments and our responses are summarised in the <a href="#">consultation section</a>.</p> |
| <b>The facility</b>                                       |   |
| The regulated facility                                    | <p>We considered the extent and nature of the facilities at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation', and Appendix 1 of RGN 2 'Interpretation of Schedule 1'.</p> <p>The extent of the facilities are defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.</p>   |
| <b>The site</b>   |   |
| Biodiversity, heritage, landscape and nature conservation | <p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p>   |

| Aspect considered                    | Decision   |
|--------------------------------------|--|
|                                      | <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p>  |
| <b>Environmental risk assessment</b> |  |
| Environmental risk                   | <p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p> <p>The assessment shows that, applying the conservative criteria in our guidance on environmental risk assessment, all emissions may be categorised as environmentally insignificant.</p>  |
| <b>Operating techniques</b>          |  |
| General operating techniques         | <p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.</p> <p>The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.</p>  |
| <b>Permit conditions</b>             |  |
| Waste types                          | <p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.</p> <p>We are satisfied that the operator can accept these wastes for the following reasons:</p> <ul style="list-style-type: none"> <li>• they are suitable for the proposed activities</li> <li>• the proposed infrastructure is appropriate; and</li> <li>• the environmental risk assessment is acceptable.</li> </ul> <p>We made these decisions with respect to waste types in accordance with Waste classification technical guidance WM3.</p> |
| Pre-operational conditions           | <p>Based on the information in the application, we consider that we need to impose pre-operational conditions.</p> <p>See <a href="#">key issues</a>.</p>  |
| Improvement programme                | <p>Based on the information on the application, we consider that we need to impose an improvement programme.</p> <p>See <a href="#">key issues</a>.</p>  |
| Emission limits                      | <p>No emission limits have been added, amended or deleted as a result of this variation.</p>   |
| Monitoring                           | <p>Monitoring has not changed as a result of this variation.</p>   |

| Aspect considered                               | Decision  |
|---|---|
| Reporting                                       | Reporting has not changed as a result of this variation.  |
| <b>Operator competence</b>                      |   |
| Management system                               | There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.   |
| <b>Growth duty</b>                              |   |
| Section 108 Deregulation Act 2015 – Growth duty | <p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p> |

# Consultation

## Responses from organisations listed in the consultation section

|   |
|---|
| <b>Response received from</b>   |
| Public Health England   |
| <b>Brief summary of issues raised</b>   |
| The main emission of potential concern is for any container residues or leaks of oil to have the potential to attract pests (vermin, flies and other insects), particularly if the oil may be food waste in origin. The Environmental Risk Assessment has identified the hazard but describes the process is unlikely to attract scavenging animals. We would ask the Regulator to confirm whether they are satisfied with this assessment and ensure there are suitable controls in place. |
| <b>Summary of actions taken or show how this has been covered</b>   |
| We have assessed the risk assessment and conclude that the process is unlikely to attract pests.  |

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| <b>Response received from</b>  |
| Preston City Council – Environmental Health  |
| <b>Brief summary of issues raised</b>  |
| We are not aware of any noise or other amenity issues at this site, or any enforcement action. |
| <b>Summary of actions taken or show how this has been covered</b>                              |
| No further action required.  |